

Christopher M. Lee  
State Bar No. 24041319  
Eric A. Maskell  
State Bar No. 24041409  
Jim Morrison  
State Bar No. 14519050  
LEE LAW FIRM, PLLC  
8701 Bedford Euless Rd, Ste 510  
Hurst, TX 76053  
469-646-8995 Phone  
469-694-1059 Fax  
ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>JAVIER GARCIA</b>	§	<b>CASE NO. 24-30008-JPN-13</b>
	§	
<b>Debtors</b>	§	<b>CHAPTER 13</b>
	§	

**MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 13 SCHEDULES,  
STATEMENT OF AFFAIRS AND CHAPTER 13 PLAN**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Debtor, Javier Garcia requests an order extending the deadlines to file Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies pursuant to L.B.R. 1007.1(a) and F.R.B.P 3015 and would show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. Debtor filed his petition in bankruptcy under Chapter 24-30008-JPN-13 on 01/01/2024
3. Chapter 13 Schedules, Statement of Affairs, and Chapter 13 Plan are due 1/16/2024.
4. Debtor will need an additional fourteen (14) days, until 1/30/2024, to prepare the Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies because of the need to gather information. Debtor's other obligations have resulted in a delay in providing

his Attorney information necessary to produce accurate Chapter13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies.

WHEREFORE, PREMISES CONSIDERED, Debtor **Javier Garcia** respectfully requests the Court to grant an extension of fourteen (14) days, until 1/30/2024, for Debtor to file his Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies and for such other relief the Court may grant.

Dated: January 16, 2024

Respectfully Submitted,

LEE LAW FIRM, PLLC

By: /s/Christopher M Lee

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 16, 2024 a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

**DEBTOR:**

Javier Garcia

5442 Baslow Drive  
Katy, TX 77449

**STANDING CHAPTER 13 TRUSTEE:**

Tiffany Castro  
9821 Katy Freeway Ste 590  
Houston, TX 77024-1294

**U.S. TRUSTEE**

US Trustee  
515 Rusk Ave. Ste 3516  
Houston, TX 77002

By: /s/ Christopher M. Lee  
Christopher M. Lee  
State Bar No. 24041319

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